REMARKS

In the non-final Office Action mailed March 28, 2007, the Examiner rejected all of the claims 1-8. Claims 1-20 remain pending, of which claims 9-20 have been withdrawn. Applicants request reconsideration of claims 1-8 in view of the following remarks.

Rejection under Section 101

Claims 1-8 were rejected under § 101 as allegedly being directed to non-statutory subject matter. The Examiner asserted that the claims cover an abstract idea and that they do not include a useful concrete tangible result. Office action page 3. This rejection is traversed.

Independent claim 1 is directed to a computer-implemented method that involves at least two data records (first and second data records). Claim 1 recites "associating the second data record with the grouping value, such that a modification of the first data record will result in a synchronizing modification of the second data record". Applicants submit that claim 1 and its dependent claims are directed to statutory subject matter.

First, the claimed subject matter is statutory because it transforms recorded information by associating the second data record with the grouping value. This transformation is evidenced by the phrase ("such that ...") that follows the association phrase in the claim, because this phrase indicates that the association has at least the effect that "a modification of the first data record will result in a synchronizing modification of the second data record". Thus, a transformation takes place, and it has a definite result.

Second, the result of such an association has practical application, for example as described with reference to FIG. 5 in the present specification, which relates to groupings of related data (here referred to as "Infotypes"). The described example relates to records having grouping values "A" and "B". Specification 12:9-12. Particularly, the example states:

> Thus, any data that is in an Infotype record associated with the grouping value A ***is shared*** with all other records having the grouping value A. Records associated with the timelines 506, 508, and 510 ***are not copied*** to any other location, since they have no matching grouping value, or are ungrouped, as shown.

Specification 12:24-28 (emphasis added unless otherwise noted). That is, this example describes a practical implementation in which the sharing, or non-sharing, of data is managed using grouping values. Applicants submit that the present claims are directed to statutory subject matter in view of this practical application.

Third, Applicants specifically submit that the result of the method recited in claim 1 is useful, concrete and tangible. The method can be used for practical applications recited in the present disclosure (see, e.g., FIGs. 3, 5, 6 and 9), and is therefore useful. The method is computer-implemented and recites specific steps (e.g., "selecting" and "associating"), and moreover a result of the last recited step is that "a modification of the first data record will result in a synchronizing modification of the second data record". It follows that the method is both concrete and tangible.

As such, Applicants submit that there is no basis for the Examiner's assertions. Applicants request that the rejection under § 101 be explicitly withdrawn.

Rejections under Section 103

The Office Action rejected claims 1-9 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application No. 2005/0177587 A1 to Mukundan et al. (**Mukundan**), in view of U.S. Patent No. 6,112,209 to Gusack (**Gusack**).

In particular with respect to claim 1, for example, the Office Action states that **Mukundan** teaches the invention substantially, but does not explicitly teach a grouping value. The Office Action contends that **Mukundan** teaches logical grouping or mappings may be defined to associate identified fields for changes, and contends that **Gusack** discloses the grouping value of the present claims by teaching a linking value. The Office Action further contends it would have been obvious to one of ordinary skill at the time of the invention to have combined **Mukundan** with **Gusack** because a linking value or grouping value would enable contents of the first field to be dynamically linked and synchronized with the contents of the second field.

This rejection is traversed. Applicants respectfully submit that **Gusack**, **Mukundan**, or their combined teachings do not render obvious the subject matter set forth in Applicants' independent claim 1.

Applicants' independent claim 1, for example, is directed to a computer-implemented method of changing grouping values in a data model. The method comprises selecting a first data record stored at a first level of a data model, the first data record being connected to other first-level data by way of central data stored at a second level of the data model. The method also comprises associating the first data record with a grouping value that is generated based on a pre-determined grouping reason. The method additionally comprises selecting a second data record stored at the first level. The method further comprises associating the second data record with the grouping value, such that a modification of the first data record will result in a synchronizing modification of the second data record.

Mukundan is a very lengthy patent reference that describes numerous aspects of business software applications that operate in a Web-based environment to retain the look-and-feel of desktop-based applications with which users are already familiar. (Para. 0009). One of the aspects of the reference that the Examiner has relied upon appears in the Abstract, and relates to a method in which a first field and a second field of a data record are displayed to a user using a client program, and the second field has one or more attributes that are dependent upon the value of the first field. (Abstract.) **Mukundan** discloses that, in response to a detection that the value of the first field has changed, the value of the first field is sent to a server program that is configured to process the change in value of the first field and determine corresponding changes with respect to the one or more attributes of the second field. (Abstract.) **Mukundan** further discloses that the corresponding changes with respect to the one or more attributes of the second field are sent from the server program to the client program.

Gusack relates to an associative database model for electronic-based informational assemblies. (Title.) One of the aspects of the reference that the Examiner has relied upon appears in the Abstract, and relates to an indexing system and linking method wherein each of a plurality of relational database tables is assigned a unique domain of unique alphanumeric indicia. (Abstract.) **Gusack** teaches that the records are bi-directionally linked to each other via

a plurality of linking table indexes wherein linking fields are defined to store indicia belonging to two or more records in the data set. (Abstract.)

Neither **Mukundan** nor **Gusack**, nor their combined teachings, discloses or suggests a method that includes, as required by claim 1, associating two data records (a first data record and a second data record) with a grouping value that is generated based on a predetermined grouping reason, such that a modification of the first data record will result in a synchronizing modification of the second data record. Indeed, **Mukundan** does not disclose the use of a grouping value, as the Examiner has conceded. Moreover, **Mukundan** does not disclose a grouping value that is generated based on a predetermined grouping reason. **Gusack**, in turn, also does not disclose a grouping value as recited in claim 1. This is because **Gusack's** linking values are made from the indicia identifying the record—for example, **Gusack** states: "Said fields ... that store unique record identifiers are herein below also referred to as linking fields". (**Gusack** 12:52-54.) As such, a value in the linking fields taught by **Gusack** is not a grouping value that is generated based on a predetermined grouping reason, as required by claim 1.

The Examiner's contentions with respect to claim 1, specifically with respect to the Examiner's characterizations of **Gusack**, do not seem to address these specific and important distinctions in Applicants' claim 1, and thus do not carry the Examiner's burden in support of the claim rejections.

In addition, **Mukundan** and **Gusack**, even if their teaching are combined, do not render the subject matter of Applicants' claim 1 obvious. The use of a grouping reason to generate a grouping value to which data records may be associated provides important advantages that are not possible with the methods disclosed in **Mukundan** and **Gusack**. In particular, as shown in Applicants' Figure 3, different grouping values may be associated with different data records for different reasons (e.g., payment, overtime calculation, etc.). As such, there may be one grouping of assignment data records for a particular nurse for payment reasons, and a different grouping of assignment data records for the nurse for overtime calculation purposes. In general, the method set forth in Applicants' claim 1 addresses the specific challenges that some data modifications are neither universal nor inherently well defined. (Applicants' specification, at page 1, lines 21-28; page 28, lines 18-24.)

Accordingly, Applicants submit that independent claim 1 defines subject matter that is patentable in view of **Mukundan** and **Gusack**, as do dependent claims 2-8, and ask that the Examiner remove the obviousness rejection of claims 1-8 based on these references.

Conclusion

Applicants submit that claims 1-8 are in condition for allowance, and ask that the Examiner issue a notice of allowance.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Examiner is authorized to charge the required petition for extension of time fee of $450 to deposit account 06-1050. Please apply any other charges or credits to deposit Account 06-1050.

Respectfully submitted,

Date: 8/28/07

J. Richard Soderberg
Reg. No. 43,352

Fish & Richardson P.C.
60 South Sixth Street
Suite 3300
Minneapolis, MN 55402
Telephone: (612) 335-5070
Facsimile: (612) 288-9696
60422703.doc